

REDACTED

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BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Transmitted Via First Class Mail

December 9, 2005

[REDACTED]
Social Circle, GA 30025

Re: Soil Sampling Data Summary Report for
728A East Hightower Trail, Social Circle, GA
BBL Project #: 85533

Dear [REDACTED]

On September 1 and 2, 2005 and with your permission, Blasland, Bouck & Lee, Inc. (BBL) collected soil samples from your property located at 728A East Hightower Trail in Social Circle, Georgia. These activities were performed on behalf of Exxon Mobil Corporation (ExxonMobil) to provide data to evaluate the potential impacts of a former fertilizer manufacturing plant whose facilities appear to have been located on, or adjacent to, your property.

All soil samples collected were tested in the field to determine the approximate levels of arsenic and lead, which research has shown may be related to past operations of the former fertilizer plant. Based on these field test results, select samples were submitted to, and analyzed by, a laboratory approved by the United States Environmental Protection Agency (USEPA).

The purpose of this letter is to describe the soil sampling activities that were performed at your property and to present the results. Also included are photos of the inspection that was performed to document the condition of your property at the time of sampling (Attachment 1). Copies of this report are being submitted to the USEPA.

Soil Sample Collection Activities

Prior to sampling, the locations of underground utilities were identified by a utility locating service to minimize the possibility of disrupting services to the property and protect the safety of the workers.

Two types of soil samples were collected from your property as follows:

- Surface soil samples were collected from 0 to 6 inches below ground surface from two locations on the south side and three locations on the north side of the property from the locations shown on Figure 1. At each of the five locations, four additional samples were collected in a 10 foot radius at each location, mixed together in equal amounts, and then tested in the field to determine the approximate concentrations of arsenic and lead. Field testing was performed on the five surface soil samples using a portable X-ray fluorescence (XRF) device. The five surface soil samples were then sent to the laboratory for analysis. All samples



submitted to the laboratory were analyzed for metals (including arsenic and lead) and pH (soil acidity).

- Deeper soil samples were collected from two locations on the south side and three locations on the north side of the property. The locations of these deeper soil samples are shown on Figure 1. At each location, soil samples were collected from 0.5 to 2 feet, 2 to 4 feet, 4 to 6 feet, and 6 to 8 feet below ground surface. These samples were tested in the field using the XRF device described above to determine the approximate concentrations of arsenic and lead. Based on these results, select samples were sent to the laboratory and analyzed for metals (including arsenic and lead) and pH (soil acidity). Toxicity Characteristic Leaching Procedure (TCLP) arsenic and lead was performed on one soil sample exceeding the USEPA's soil screening levels for arsenic and/or lead. TCLP analysis results are used to determine disposal and treatment options for impacted soils.

A list of the soil samples collected from your property is provided in Table 1.

Results of the Soil Sampling

The USEPA has established screening levels (i.e., levels that trigger additional assessment and evaluation) for metals. The USEPA screening values for arsenic and lead are 27 milligrams per kilogram (mg/kg) and 400 mg/kg, respectively.

Arsenic was detected in 15 soil samples collected from your property at concentrations up to 24.7 mg/kg, which are less than USEPA's screening level of 27 mg/kg (Table 2). Lead was detected in all 17 soil samples collected from your property at concentrations up to 2,990 mg/kg, with 4 samples containing lead at concentrations greater than USEPA's screening level of 400 mg/kg (Table 2). Iron was also detected above USEPA's screening levels in the samples collected from your property.

One soil sample exceeding the USEPA's soil screening levels was selected for TCLP analyses. TCLP arsenic and lead were not detected (Table 2).

Laboratory analytical results for the soil samples collected from your property are provided in Table 2.

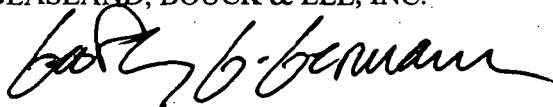
Conclusion

As described above, soil samples collected from your property contained concentrations of lead above the USEPA's screening level of 400 mg/kg. Iron was also detected above USEPA's screening levels in the samples collected from your property. ExxonMobil is submitting these results to the USEPA. We will work with these agencies to determine what further actions (if any) are necessary for your property, and will keep you informed. Any necessary actions for your property will be described in the upcoming *Removal Action Delineation Report/Removal Action Work Plan* that will be prepared by BBL on behalf of ExxonMobil and reviewed and approved by USEPA. This plan will be prepared upon completion of all sampling activities required by USEPA.

Thank you once again for granting ExxonMobil access to your property to conduct these soil sampling activities.

Sincerely,

BLASLAND, BOUCK & LEE, INC.



Geoffrey G. Germann, P.E.
Senior Engineer II

GGG/cbc

Enclosures:

Table 1 – Summary of Analytical Program for Samples Collected from 728 East Hightower Trail

Table 2 – Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728 East Hightower Trail

Figure 1 – Sample Location Map 728 East Hightower Trail

Attachments:

Attachment 1 – Photographs

cc: D. Andrews, USEPA
B. Frink, ExxonMobil
R. Wallis, ExxonMobil
M. Ross, ExxonMobil

Information Redacted pursuant to 5 U.S.C.
Section 552 (b)(6), Personal Privacy

Exemption 7 _____ (A) Interference with Enforcement Proceedings
_____ (B) Right to Fair Trial
 X (C) Unwanted Invasion of Personal Privacy

Tables

Table 1
Summary of Analytical Program for Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement			Comments
				Metals	pH	TCLP & Total Arsenic and Lead	
North side of property							
SCSB-728A-HT-1	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the north side of the property.
SCSB-DUP-34	0-0.5	09/01/05		X	X		Duplicate sample of SCSB-728A-HT-1 (0-0.5)
SCSB-728A-HT-1	0.5-2	09/01/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-1	2-4	09/01/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-1	4-6	09/01/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-1	6-8	09/01/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-2	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the north side of the property.
SCSB-728A-HT-2	0.5-2	09/01/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-2	2-4	09/01/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-2	4-6	09/01/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-2	6-8	09/01/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-2-2	0-0.5	09/02/05	X	X	X		Combination (composite) surface soil sample of five locations from the north side of the property.
SCSB-728A-HT-2-2	0.5-2	09/02/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-2-2	2-4	09/02/05	X	X	X		Soil sample collected from the north side of the property
SCSB-728A-HT-2-2	4-6	09/02/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-2-2	6-8	09/02/05	X				Soil sample collected from the north side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

Table 1
Summary of Analytical Program for Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement			Comments
				Metals	pH	TCLP & Total Arsenic and Lead	
South side of property							
SCSB-728A-HT-3	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the south side of the property.
SCSB-728A-HT-3	0.5-2	09/01/05	X	X	X		Soil sample collected from the south side of the property
SCSB-728A-HT-3	2-4	09/01/05	X	X	X		Soil sample collected from the south side of the property
SCSB-728A-HT-3	4-6	09/01/05	X				Soil sample collected from the south side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-3	6-8	09/01/05	X				Soil sample collected from the south side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-3-TCLP	0-2	09/01/05				X	Combination (composite) of soil samples at each depth interval
SCSB-728A-HT-4	0-0.5	09/01/05	X	X	X		Combination (composite) surface soil sample of five locations from the south side of the property.
SCSB-728A-HT-4	0.5-2	09/01/05	X	X	X		Soil sample collected from the south side of the property
SCSB-728A-HT-4	2-4	09/01/05	X	X	X		Soil sample collected from the south side of the property
SCSB-728A-HT-4	4-6	09/01/05	X				Soil sample collected from the south side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-728A-HT-4	6-8	09/01/05	X				Soil sample collected from the south side of the property not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

Notes:

1. Samples depths are measured in feet below ground surface.
2. Laboratory measurements were performed by TestAmerica, Inc. of Nashville, Tennessee.
3. Sample locations are shown on Figure 1.

Table 2
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Analyte	Screening Level	Units	Concentration in Sample:				
			SCSB-728AHT-1	SCSB-728AHT-1 -DUP	SCSB-728AHT-1	SCSB-728AHT-1	SCSB-728AHT-2
			0 - 0.5 ft bgs 9/1/2005	0 - 0.5 ft bgs 9/1/2005	0.5 - 2 ft bgs 9/1/2005	2 - 4 ft bgs 9/1/2005	0 - 0.5 ft bgs 9/1/2005
Metals							
Aluminum	76000	mg/kg	13100	11600	18800	14100	14200 J
Antimony	31	mg/kg	2.62 J	2.91 J	1.69 J	11.8 U	6.91 J
Arsenic	27	mg/kg	8.11	7.59	6.85	4.1	11.2
Barium	5400	mg/kg	61.9	49.4	17.1	11.5	58.3
Beryllium	150	mg/kg	1.18 U	1.19 U	1.26 U	1.18 U	1.28 U
Cadmium	37	mg/kg	0.803 J	0.814 J	1.19 J	0.989 J	1.4
Calcium	--	mg/kg	854	874	250	59.4	3190 J
Chromium	210	mg/kg	16.4	15.9	27.1	20.4	23.9 J
Cobalt	900	mg/kg	2.08	1.42	1.37	0.895 J	2.2 J
Copper	3100	mg/kg	20.8	22	13.7	12.2	52.2 J
Iron	23000	mg/kg	21900	22100	41600	34800	35100
Lead	400	mg/kg	97	101	15.2	12.7	122
Magnesium	--	mg/kg	275	223	246	199	443
Manganese	1800	mg/kg	106	104	61.3	70.2	110
Mercury	23	mg/kg	0.0709 J	0.0739 J	0.121	0.119 U	0.0463 J
Nickel	1600	mg/kg	3.62	2.91	1.52	2.12	4.29
Potassium	--	mg/kg	329	262	260	241	333 J
Selenium	390	mg/kg	R	R	R	R	R
Vanadium	78	mg/kg	36.2	37.2	75.7	64.9	57.1
Zinc	23000	mg/kg	55.2	49.4	20	15.2	108
Metals-TCLP							
Arsenic	5	mg/L	NA	NA	NA	NA	NA
Lead	5	mg/L	NA	NA	NA	NA	NA
Miscellaneous							
% Dry Solids	--	%	84.8	84.1	79.4	80.7	78.4
pH	--	pH Units	5.9	5.1	4.8	4.5	5.2

Table 2
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Analyte	Screening Level	Units	Concentration in Sample:				
			SCSB-728AHT-2	SCSB-728AHT-2	SCSB-728AHT-2-2	SCSB-728AHT-2-2	SCSB-728AHT-2-2
			0.5 - 2 ft bgs 9/1/2005	2 - 4 ft bgs 9/1/2005	0 - 0.5 ft bgs 9/2/2005	0.5 - 2 ft bgs 9/2/2005	2 - 4 ft bgs 9/2/2005
Metals							
Aluminum	76000	mg/kg	8500 J	6970 J	15900	16100	8840
Antimony	31	mg/kg	12.2 U	2.64 J	4.62 J	5.27 J	1.3 J
Arsenic	27	mg/kg	4.86	2	1.2 U	3.18	1.14 U
Barium	5400	mg/kg	12.5	6.58	41.6	39.4	8.37
Beryllium	150	mg/kg	1.22 U	1.15 U	0.385 J	0.38 J	0.478 J
Cadmium	37	mg/kg	1.54	1.42	1.2 U	1.21 U	1.14 U
Calcium	--	mg/kg	804 J	282 J	1120	1020	185
Chromium	210	mg/kg	33.1 J	38.2 J	33.8	35.1	41.6
Cobalt	900	mg/kg	1.22 UJ	1.15 UJ	1.2 U	1.21 U	1.14 U
Copper	3100	mg/kg	20.8 J	16.5 J	41.1	45	10.1
Iron	23000	mg/kg	45100	39700	46600	46400	44700
Lead	400	mg/kg	25.7	14.2	52.1	43.1	14.3
Magnesium	--	mg/kg	149	83.8	393	347	132
Manganese	1800	mg/kg	78.9	61.5	112	114	75.2
Mercury	23	mg/kg	0.122 U	0.115 U	0.126 J	0.0459 J	0.114 U
Nickel	1600	mg/kg	1.04 J	0.964 J	2.36	2.21	0.455 J
Potassium	--	mg/kg	142 J	115 UJ	236	235	81.5 J
Selenium	390	mg/kg	7.46	R	5.2	5.46	4.82
Vanadium	78	mg/kg	77.8	71	77	76.9	73.8
Zinc	23000	mg/kg	27.8	13.8	208	166	9.64 J
Metals-TCLP							
Arsenic	5	mg/L	NA	NA	NA	NA	NA
Lead	5	mg/L	NA	NA	NA	NA	NA
Miscellaneous							
% Dry Solids	--	%	82.1	87	79	82.4	88.1
pH	--	pH Units	5.2	4.7	6.0	5.1	4.5

Table 2
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Analyte	Screening Level	Units	Concentration in Sample:				
			SCSB-728AHT-3	SCSB-728AHT-3	SCSB-728AHT-3	SCSB-728AHT-3-TCLP	SCSB-728AHT-4
			0 - 0.5 ft bgs 9/1/2005	0.5 - 2 ft bgs 9/1/2005	2 - 4 ft bgs 9/1/2005	0 - 2 ft bgs 9/1/2005	0 - 0.5 ft bgs 9/1/2005
Metals							
Aluminum	76000	mg/kg	6820 J	8720 J	19800 J	NA	9590 J
Antimony	31	mg/kg	3.74 J	11.3 U	12.6 U	NA	14.3
Arsenic	27	mg/kg	9.94 J	3.58 J	7.78 J	6.94	24.7 J
Barium	5400	mg/kg	96.9	64.3	19.9	NA	227
Beryllium	150	mg/kg	1.22 U	1.13 U	1.26 U	NA	0.839 J
Cadmium	37	mg/kg	0.763 J	0.425 J	0.972 J	NA	1.1 J
Calcium	--	mg/kg	2120 J	1050 J	470 J	NA	4890 J
Chromium	210	mg/kg	15	11.2	28	NA	16.1
Cobalt	900	mg/kg	2.53	1.5	1.26 U	NA	6.74
Copper	3100	mg/kg	66.8	25.4	16.8	NA	76.3
Iron	23000	mg/kg	15500	11800	37300	NA	29600
Lead	400	mg/kg	2990 J	718 J	191 J	1830	912 J
Magnesium	--	mg/kg	380	215	194	NA	1900
Manganese	1800	mg/kg	148 J	135 J	76 J	NA	285 J
Mercury	23	mg/kg	1.26	0.0957 J	0.0596 J	NA	0.47
Nickel	1600	mg/kg	5.7	4.09	2.49	NA	17.9
Potassium	--	mg/kg	270	223	203	NA	1270
Selenium	390	mg/kg	6.13 J	5.39 J	5.58 J	NA	2.35 J
Vanadium	78	mg/kg	22.6	20.9	64.1	NA	30.5
Zinc	23000	mg/kg	138 J	48.5 J	31 J	NA	135 J
Metals-TCLP							
Arsenic	5	mg/L	NA	NA	NA	0.1 U	NA
Lead	5	mg/L	NA	NA	NA	0.05 U	NA
Miscellaneous							
% Dry Solids	--	%	81.9	88.5	79.3	90.8	83.6
pH	--	pH Units	6.1	5.7	5.6	NA	6.2

Table 2
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Analyte	Screening Level	Units	Concentration in Sample:	
			SCSB-728AHT-4	SCSB-728AHT-4
			0.5 - 2 ft bgs 9/1/2005	2 - 4 ft bgs 9/1/2005
Metals				
Aluminum	76000	mg/kg	9760 J	9870 J
Antimony	31	mg/kg	2.15 J	1.69 J
Arsenic	27	mg/kg	6.61 J	5.24 J
Barium	5400	mg/kg	88.5	15.9
Beryllium	150	mg/kg	0.536 J	0.334 J
Cadmium	37	mg/kg	0.665 J	1.24
Calcium	--	mg/kg	2840 J	475 J
Chromium	210	mg/kg	19.2	24.3
Cobalt	900	mg/kg	3.43	1.21
Copper	3100	mg/kg	25.1	24.4
Iron	23000	mg/kg	23900	46700
Lead	400	mg/kg	68.2 J	38.3 J
Magnesium	--	mg/kg	1270	395
Manganese	1800	mg/kg	202 J	78.7 J
Mercury	23	mg/kg	0.062 J	0.0458 J
Nickel	1600	mg/kg	5.17	1.18 U
Potassium	--	mg/kg	738	309
Selenium	390	mg/kg	4.31 J	7.55 J
Vanadium	78	mg/kg	38.4	76.1
Zinc	23000	mg/kg	45.8 J	17 J
Metals-TCLP				
Arsenic	5	mg/L	NA	NA
Lead	5	mg/L	NA	NA
Miscellaneous				
% Dry Solids	--	%	88.6	84.8
pH	--	pH Units	7.5	7.1

Table 2
Summary of Analytical Results for Detected Metals in Soil Samples Collected from 728A East Hightower Trail
Social Circle, Georgia

Notes:

Shaded values exceed the site specific action level

bgs - below ground surface

J - estimated value

mg/kg - milligrams per kilogram

mg/L - milligrams per liter

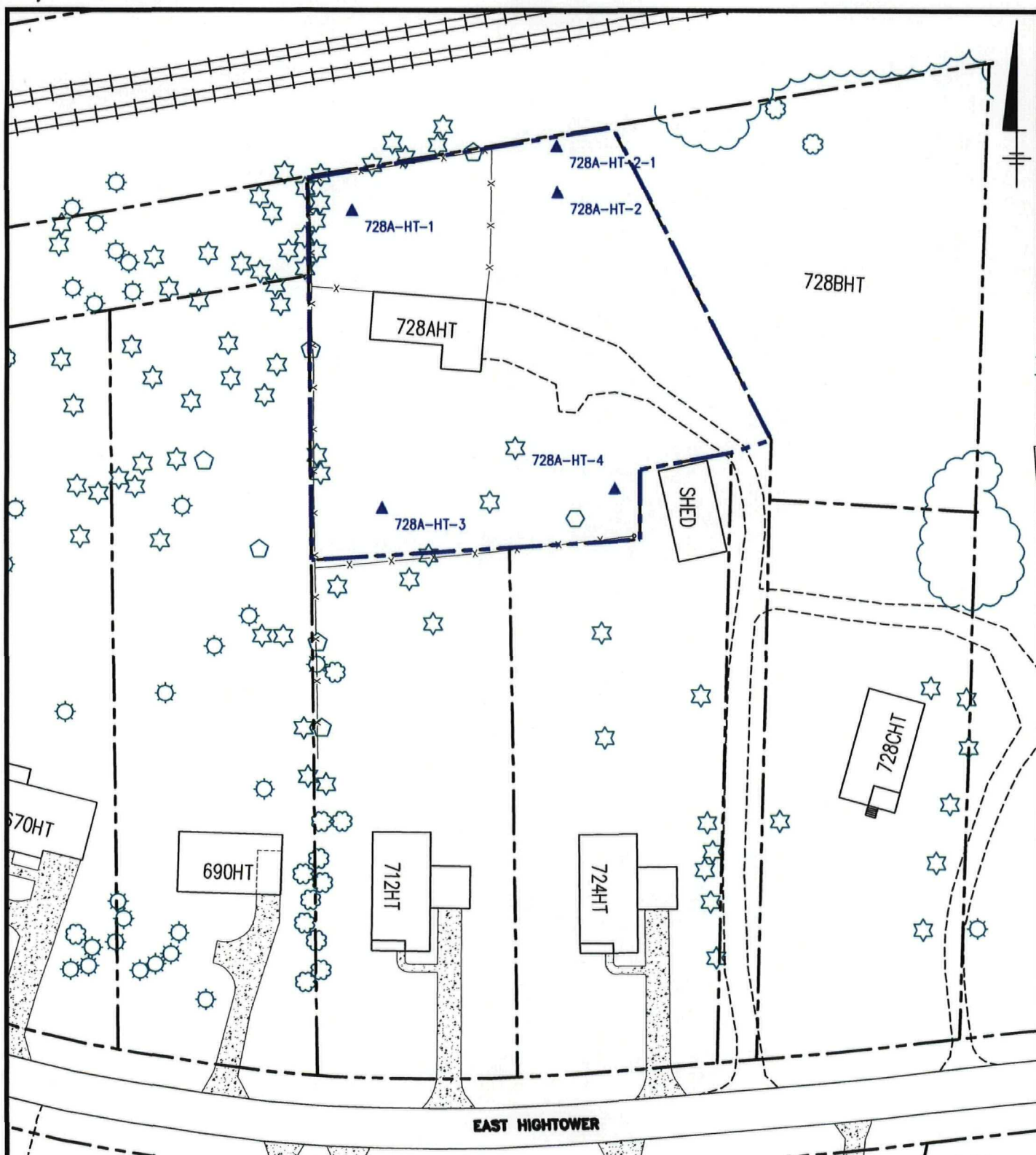
NA - not analyzed

U - not detected

-- no site-specific action level defined

R - rejected

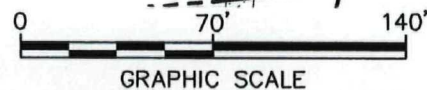
Figure



LEGEND:

- PROPERTY LINE
- CONCRETE
- FENCE LINE
- GEORGIA RAILROAD
- TREE LINE

- ▲ SOIL BORING LOCATION
- ★ TREES



EXXONMOBIL
VCC - SOCIAL CIRCLE, GEORGIA

**SAMPLE LOCATION MAP FOR
728A EAST HIGHTOWER**

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
728AHT

X: 85533X0P, X02.DWG
P: PLT-AP1
11/4/05 CAR-85-LEE
R: \CURRENT\OTHER\85533004\PR\85533G08.DWG

Attachment

Attachment 1
Photographs of 728A East Hightower Trail, Social Circle, GA



728A East Hightower Trail, eastern edge looking north.



728A East Hightower Trail, eastern edge looking west.

Attachment 1
Photographs of 728A East Hightower Trail, Social Circle, GA



728A East Hightower Trail, eastern edge looking west.



728A East Hightower Trail, southern edge looking north.